

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
REBECCA A. LEVY
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Rebecca_Levy@fd.org
6 Attorney for Sabir Philimon

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 SABIR PHILIMON,
14 Defendant.

Case No. 2:22-cr-00215-GMN-EJY

**STIPULATION TO CONTINUE
CHANGE OF PLEA HEARING**
(First Request)

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16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
17 United States Attorney, and Lauren Ibanez, Assistant United States Attorney, counsel for
18 the United States of America, and Rene L. Valladares, Federal Public Defender, and
19 Rebecca A. Levy, Assistant Federal Public Defender, counsel for Sabir Philimon, that the
20 Change of Plea Hearing currently scheduled on April 17, 2024 at 9:00 a.m., be vacated and
21 continued to April 22, 2024 at 11:00 a.m. or a date and time convenient to the Court.

22 This Stipulation is entered into for the following reasons:

23 1. Defense counsel requires additional time to prepare, investigate, and discuss the
24 case with Defendant. Additionally, defense counsel will be out of the country on the currently
25 scheduled date.

26 2. The defendant is in custody and agrees with the need for the continuance.

1 3. The parties agree to the continuance.

2 This is the first request for a continuance of the Change of Plea hearing.

3 DATED this 1st day of April 2024.

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5 RENE L. VALLADARES
6 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

7 */s/ Rebecca A. Levy*
8 By _____
9 REBECCA A. LEVY
 Assistant Federal Public Defender

/s/ Lauren Ibanez
 By _____
 LAUREN IBANEZ
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 SABIR PHILIMON,

7 Defendant.
8

Case No. 2:22-cr-00215-GMN-EJY

ORDER

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10 Based on the stipulation and good cause appearing;

11 IT IS ORDERED that the Change of Plea hearing currently scheduled for Wednesday,
12 April 17, 2024, at 9:00 a.m., be vacated and continued to April 22, 2024 at 11:00 a.m.

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14 DATED this 2 day of April 2024.

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17 UNITED STATES DISTRICT JUDGE
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